

BP Environmental, Inc.

1103 S. Talbot Street Suite D
St. Michaels, MD 21663

Schematic of Flow Through the Harbeson Wastewater Treatment Plant

Prepared For:

Allen's Family Foods Inc.
126 N. Shipley Street
Seaford, DE 19973

Site:

Harbeson Poultry Processing Plant
18752 Harbeson Road (Route 5)
Harbeson, DE 19951

Date: 10-06-10
Revision Date:
Project: AL-130-18
Drafted by: MK

Attachment A – Further Explanation of EPA Form 2C, Item II-B Items

Outfall 001

An estimated, 1.03 million gallons of poultry process water are input in the wastewater treatment system per operational day. The sanitary wastewater average daily flow is estimated based on the number of employees present at the facility each day and a design flow of 35 gallons/employee/shift, as referenced in 15A North Carolina Administrative Code 02T .0114. The boiler blowdown average daily flow is estimated by plant maintenance personnel based on experience. Storm water and wash water generated in Drainage Area 002, storm water generated in Drainage Area 003 is conveyed to concrete sumps located prior to Outfalls 002 and 003, respectively. Storm water collected in each of the concrete sumps is transferred to Anoxic BNR A via high flow-rate Gorman-Rupp pumps where it subsequently receives treatment.

Wastewater Treatment System

The wastewater treatment system consists of Primary Screening (via Offal), Grit Removal, an approximate 45,000 gallon Dissolved Air Flotation (DAF) device, two (2) 1.5 million gallon Anoxic Biological Nutrient Removal (BNR) Basins (Anoxic BNR A and Anoxic BNR B), a 1.6 million gallon Aeration Cell (CMAS 1), a 0.5-million gallon Aeration Cell (CMAS 2), a 5,600 gallon Flocculation Tank, a 0.424 million gallon Clarifier (Clarifier 1), a 53,000 gallon Clarifier (Clarifier 2), and a 28,250 gallon Chlorination/Dechlorination Contact Tank. The treatment train also includes two (2) 134,000 gallon Aerobic Digesters for sludge treatment. Based on the permitted flow of 1.25 million gallons per day, the retention time of water in the wastewater treatment system is 4.5 days.

Disposal of Sludge Collected During Wastewater Treatment

Recycle Activated Sludge (RAS) is transferred from the Primary Clarifier back to CMAS 1 and CMAS 2. RAS is transferred manually to one of the two (2) Aerobic Digesters via a wasting valve where it is subsequently classed as Waste Activated Sludge (WAS). Following aerobic digestion, the WAS is conveyed to a press where it is compressed and prepared for off-site transfer. Liquid is decanted from the WAS in the digesters and the press and is returned to Anoxic BNR A. Clean Delaware, Inc. is currently contracted to remove the WAS from the site. On operational days, an average of approximately nineteen (19) tons of WAS is removed from the site.

Outfall 002

Drainage Area 002 is approximately 42,282 square-feet in size. Average daily storm water generated in this drainage area is calculated by multiplying the collection area by the average annual rainfall depth, obtained from the National Oceanic and Atmospheric Administration's (NOAA) National Climatic Data Center (NCDC) data inventory for the Wilmington, DE station, and dividing by the number of days in a calendar year. Storm water generated in this drainage area is conveyed to a concrete sump prior to reaching the outfall, which would convey storm water to Beaverdam Creek. Wash water, generated via vehicle/equipment washing, and hosing down of areas at the site, is also conveyed to the sump associated with Outfall 002. The average daily flow of wash water was estimated by plant personnel

based on experience. Water collected in the sump is transferred to Anoxic BNR A via a high flow rate Gorman-Rupp pump operated on a float system, where it is subsequently treated and discharged via Outfall 001. Water, including storm water and wash water, is only discharged from Outfall 002 during atypical precipitation events during which the capacity of the wastewater treatment system is being approached. Note that no recordable discharge has occurred from Outfall 002 during the past three (3) years.

Outfall 003

Drainage Area 003 is approximately 70,528 square-feet in size. Average daily storm water generated in this drainage area is calculated by multiplying the collection area by the average annual rainfall depth, obtained from the NOAA's NCDC data inventory for the Wilmington, DE station, and dividing by the number of days in a calendar year. Storm water generated in this drainage area is conveyed to a concrete sump prior to reaching the outfall, which would convey storm water to Beaverdam Creek. Water collected in the sump is transferred to Anoxic BNR A via a high flow rate Gorman-Rupp pump operated on a float system, where it is subsequently treated and discharged via Outfall 001. Water is only discharged from Outfall 003 during atypical precipitation events during which the capacity of the wastewater treatment system is being approached. Note that no recordable discharge has occurred from Outfall 002 during the past three (3) years.

Outfall 004

Drainage Area 003 is approximately 550,000 square-feet in size. Average daily storm water generated in this drainage area is calculated by multiplying the collection area by the average annual rainfall depth, obtained from the NOAA's NCDC data inventory for the Wilmington, DE station, and dividing by the number of days in a calendar year. Storm water is conveyed to an approximate one (1) acre storm water retention pond, located in the northern portion of the site, prior to being discharged to Beaverdam Creek.

Attachment B – Further Explanation of EPA Form 2C, Item II-C

Maximum daily values (columns 4-a-2 and 4-b-2) for sanitary wastewater, boiler blowdown, and wash water are estimated by doubling the average daily flow estimates.

Maximum daily values (columns 4-1-2 and 4-b-2) for all storm water discharges are calculated using the collection area of the Drainage Area and the precipitation depth of a 100 year, 24 hour design precipitation event, as given by the National Oceanic and Atmospheric (NOAA), National Weather Service's (NWS) Hydrometeorological Design Studies Center for location: Delaware 38.594 N, 75.45 W, 49 feet.

Attachment C – Laboratory Data for Item VII of EPA Form 2C

RESULTS OF CHRONIC TOXICITY TESTING
ON SEPTEMBER AND OCTOBER 2010 EFFLUENT SAMPLES FROM
ALLEN FAMILY FOODS, INC.

Prepared for:

Allen Family Foods, Inc.
18752 Harbeson Road
Harbeson, Delaware 19951

Prepared by:

EA Engineering, Science, and Technology, Inc.
15 Loveton Circle
Sparks, Maryland 21152
For questions, please contact Wayne McCulloch
ph: 410-771-4950

Results relate only to the items tested or to the samples as received by the laboratory.

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EA Engineering, Science, and Technology, Inc.*

This report contains 8 pages plus 2 attachments.


Wayne L. McCulloch
Laboratory Director

21 October 2010
Date

INTRODUCTION

At the request of Allen Family Foods, Inc., EA Engineering, Science, and Technology performed chronic toxicity testing on 24-hour composite samples of final effluent from Allen Family Foods' Harbeson, Delaware facility (NPDES permit number DE0000299). The effluent composite samples were collected on 12-13, 14-15 and 16-17 September 2010. The test species, *Pimephales promelas* (fathead minnow) and *Ceriodaphnia dubia* (water flea) were exposed to 100 percent effluent and a laboratory water control. The objective of the toxicity testing was to determine the effects on survival and reproduction (*C. dubia*) or biomass (*P. promelas*) of the organisms exposed to the 100 percent effluent concentration as compared to the control. The *C. dubia* 3-brood chronic toxicity test was deemed to be an invalid test because the control treatment did not meet the minimum acceptability criterion of 15 young per female for the reproduction test endpoint. A second suite of effluent composite samples were collected on 3-4, 5-6 and 7-8 October 2010 in order to re-run the *C. dubia* chronic toxicity test.

The toxicity testing was conducted following EA's standard operating procedures (EA 2006) which are in accordance with US EPA guidance (US EPA 2002). The results of the chronic toxicity tests were analyzed using the ToxCalc statistical software package (Version 5.0, Tidepool Scientific Software) and followed US EPA guidance (US EPA 2002). Summaries of sample and test data are presented on pages 5 and 6 for *P. promelas*, and pages 7 and 8 for *C. dubia*. Copies of raw data sheets and statistics are included in Attachment I, and the Report Quality Assurance Record is included as Attachment II.

RESULTS

The results of the toxicity testing indicated that the September and October 2010 composite final effluent samples from Allen Family Foods were not chronically toxic to *Pimephales promelas* or *Ceriodaphnia dubia*, respectively. These toxicity test results comply with current NELAC standards.

The results of the *P. promelas* chronic toxicity test initiated on 14 September 2010 are presented on page 6. At the end of the seven-day exposure period there was 95 percent control survival, and 93 percent survival in the 100 percent effluent concentration. Mean biomass in the 100 percent effluent concentration was 0.784 mg/organism, which was not significantly different ($p=0.05$) from the control mean biomass of 0.793 mg/organism. The NOEC for this test was 100 percent effluent. The corresponding *C. dubia* chronic toxicity test was invalid because the control treatment did not meet the test method's minimum acceptability criterion of 15 young per female; therefore the test was scheduled to be re-run the week of 3 October 2010.

The results of the *C. dubia* chronic toxicity test initiated on 5 October 2010 are presented on page 8. At test termination on Day 6, there was 100 percent survival in the 100 percent effluent treatment, and 100 percent survival in the control. The 100 percent effluent treatment had mean young production of 14.5 young per female, while the control mean young production was 16.0 young per female. The 100 percent effluent treatment was not significantly ($p=0.05$) different from the control for reproduction. The resulting NOEC for this test was 100 percent effluent.

In accordance with EA's quality control/quality assurance program, monthly chronic reference toxicant tests were conducted on the in-house cultured stocks of *P. promelas* and *C. dubia*. The results of the reference toxicant tests fell within EA's acceptable control chart limits, and the results are summarized on pages 5 (*P. promelas*) and 7 (*C. dubia*).

REFERENCES

- EA. 2006. EA Ecotoxicology Laboratory Quality Assurance and Standard Operating Procedures Manual. EA Manual ATS-102. Internal document prepared by EA's Ecotoxicology Laboratory, EA Engineering, Science, and Technology, Inc., Sparks, Maryland.
- US EPA. 2002. Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms. Fourth Edition. EPA-821-R-02-013. U.S. Environmental Protection Agency, Office of Water, Washington, D.C.

SUMMARY OF SAMPLE/TEST INFORMATION

Test: *Pimephales promelas* daily renewal chronic toxicity test

Test Procedure: **EA Protocol ATS-STC-FH-10**

Larval survival and growth test with fathead minnows (*Pimephales promelas*)

Client Name: **Allen Family Foods, Inc.**

Sample Description: **Outfall 001**

EA Accession Number	Collection Time and Date	Receipt Time and Date	Sample Usage
AT0-596	0800, 12 September 2010 to 0800, 13 September 2010	0830, 14 September 2010	Test initiation & Day 1 renewal
AT0-608	0800, 14 September 2010 to 0800, 15 September 2010	1020, 16 September 2010	Day 2 & 3 renewals
AT0-623	0800, 16 September 2010 to 0800, 17 September 2010	0920, 18 September 2010	Day 4, 5, & 6 renewals

EA Test Number: **TN-10-1017**

Test Initiation Time and Date: 1010, 14 September 2010

Test Completion Time and Date: 1105, 21 September 2010

Dilution Water Description: **Moderately hard synthetic freshwater**

Test Vessel: **1-L beaker**

Test Volume: **250 ml**

Number of Organisms per Replicate: **10**

Number of Replicates per Concentration: **4**

Organism Lot Information

Lot Number: FH0-9/13-14

Source: EA's Culture Facility (Sparks, Maryland)

Age: <24 hours old

Reference Toxicant Test Information

Reference Toxicant: Potassium chloride (KCl)

EA Test Number: RT-10-116 (initiated 1 September 2010)

7-Day IC25: 614 mg/L KCl

Laboratory control chart acceptability range for IC25: 462-758 mg/L KCl

SUMMARY OF SAMPLE/TEST INFORMATION (continued)

Test Species: *Pimephales promelas* (fathead minnow)
Sample Description: Allen Family Foods – Outfall 001
Sample Dates: 12-13, 14-15, 16-17 September 2010
EA Test Number: TN-10-1017

Test Concentration (percent effluent)	7-Day Percent Survival	Mean Biomass as mg/Organism (\pm S.D.)
Control	95	0.793 (\pm 0.040)
100	93	0.784 (\pm 0.098)

Chronic Toxicity Test Endpoints (as percent effluent)

NOEC:	100
LOEC:	>100
IC25	>100

<u>Water Quality Parameters on Test Solutions</u>	<u>Range</u>
Temperature ($^{\circ}$ C):	24.0 – 24.6
pH:	7.4 – 8.3
Dissolved Oxygen (mg/L):	4.7 – 8.4
Conductivity (μ S/cm):	302 – 1,286

<u>Water Quality Parameters on Samples (at Receipt)</u>	<u>AT0-596</u>	<u>AT0-608</u>	<u>AT0-623</u>
Temperature ($^{\circ}$ C):	2.7	0.7	0.2
pH:	7.2	8.0	8.0
Total Residual Chlorine (mg/L):	<0.01	<0.01	<0.01
Alkalinity (mg/L as CaCO ₃):	150	210	214
Hardness (mg/L as CaCO ₃):	284	340	340
Conductivity (μ S/cm):	1,176	1,252	1,258

SUMMARY OF SAMPLE/TEST INFORMATION

Test: *Ceriodaphnia dubia* daily renewal chronic toxicity test

Test Procedure: **EA Protocol ATS-STC-CD-11**

Survival and reproduction test with cladoceran (*Ceriodaphnia dubia*)

Client Name: **Allen Family Foods, Inc.**

Sample Description: **Outfall 001**

<u>EA Accession Number</u>	<u>Collection Time and Date</u>	<u>Receipt Time and Date</u>	<u>Sample Usage</u>
AT0-684	0800, 3 October 2010 to 0800, 4 October 2010	0810, 5 October 2010	Test initiation & Day 1 renewal
AT0-695	0800, 5 October 2010 to 0800, 6 October 2010	0815, 7 October 2010	Day 2 & 3 renewals
AT0-706	0800, 7 October 2010 to 0800, 8 October 2010	0830, 9 October 2010	Day 4 & 5 renewals

EA Test Number: **TN-10-1172**

Test Initiation Time and Date: 0910, 5 October 2010

Test Completion Time and Date: 1430, 11 October 2010

Dilution Water Description: **Moderately hard synthetic freshwater**

Test Vessel: **30-ml cup**

Test Volume: **15 ml**

Number of Organisms per Replicate: **1**

Number of Replicates per Concentration: **10**

Organism Lot Information

Lot Number: Not applicable

Source: EA's Culture Facility (Sparks, Maryland)

Age: <24 hours old, released within an 8-hour period

Reference Toxicant Test Information

Reference Toxicant: Sodium chloride (NaCl)

EA Test Number: RT-10-121 (initiated 8 September 2010)

6-Day IC25: 531 mg/L NaCl

Laboratory control chart acceptability range for IC25: 156-1,376 mg/L NaCl

SUMMARY OF SAMPLE/TEST INFORMATION (continued)

Test Species: *Ceriodaphnia dubia* (water flea)
 Sample Description: Allen Family Foods – Outfall 001
 Sample Dates: 3-4, 5-6, 7-8 October 2010
 EA Test Number: TN-10-1172

Test Concentration (percent effluent)	6-Day Percent Survival	Mean Young Production as Neonates/Organism (\pm S.D.)
Control	100	16.0 (\pm 3.7)
100	100	14.5 (\pm 5.2)

Chronic Toxicity Test Endpoints (as percent effluent)

NOEC:	100
LOEC:	>100
IC25:	>100

<u>Water Quality Parameters on Test Solutions</u>	<u>Range</u>
Temperature ($^{\circ}$ C):	24.0 – 25.2
pH:	7.5 – 8.4
Dissolved Oxygen (mg/L):	7.0 – 8.6
Conductivity (μ S/cm):	311 – 1,134


<u>Water Quality Parameters on Samples (at Receipt)</u>	<u>AT0-684</u>	<u>AT0-695</u>	<u>AT0-706</u>
Temperature ($^{\circ}$ C):	0.1	0.0	1.4
pH:	7.3	7.6	7.8
Total Residual Chlorine (mg/L):	<0.01	<0.01	<0.01
Alkalinity (mg/L as CaCO ₃):	90	106	104
Hardness (mg/L as CaCO ₃):	228	232	232
Conductivity (μ S/cm):	1,107	1,044	1,099

ATTACHMENT I

Data Sheets and Statistical Analyses
(30 pages)



**EA Engineering, Science,
and Technology**

EA Ecotoxicology Laboratory 
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Sparks (Baltimore), Maryland 21152
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Fax: (410) 771-4204

Wayne McCulloch



FOR OFFICE USE ONLY

Species to be tested:

_____ *D. magna*
 _____ *D. pulex*
 _____ *C. dubia*
 _____ *P. promelas*
 _____ Other

_____ *Menidia* sp.
 _____ *P. pugio*
 _____ *C. variegatus*
 _____ *M. bahia*
 _____ Other

A = Acute

C = Chornic

B = Bioaccumulation

Client: Helen Family Foods Project No.: _____

NPDES Number: 0000299 Client Purchase Order Number: 4500073719

State/City/County Collected: Harbeson, Delaware Sussex County

PLEASE READ SAMPLING INSTRUCTIONS ON BACK OF FORM

[illegible]

Sampled By: <i>Christopher Brinson</i>	Date/Time <i>4/13/10 0800</i>	Received By:	Date/Time
Sampler's Printed Name: <i>Christopher Brinson</i>	Title: <i>Line Leader Operator</i>	Relinquished By:	Date/Time
Relinquished By: <i>Michael Lauri</i>	Date/Time <i>9/13/10 10:00 a.m.</i>	Received By Laboratory <i>Michael Lauri</i>	Date/Time <i>9/14/10 0830</i>
Was Sample Chilled During Collection? <input checked="" type="radio"/> Yes <input type="radio"/> No		Sample Shipped By: (circle)	
Comments:		Fed. Ex.	Puro. <input checked="" type="radio"/> UPS <input type="radio"/> Airborne
		Other: _____	



SAMPLE CHECK-IN FOR GENERAL TESTING

Client: Allen Family Foods

EA Accession Number: ATO-596

Parameter	Acceptable Range	Measurement*	Date	Time	Initials
Temperature (°C)	≤4	2.7	9/14/10	0830	VMD
Is ice present?	---	yes	↓	↓	↓
pH	6.0-9.0	7.2			
TRC (mg/L)	<0.01	<0.01	↓	↓	↓

*If outside acceptable range, contact project manager.

OTHER PARAMETERS IF REQUIRED (SEE STUDY PLAN):

Parameter	Acceptable Range	(✓)	Date	Time	Initials
Ammonia (preserve aliquot)	--				

EA Ecotoxicology Laboratory Wa
15 Loveton Circle
Sparks (Baltimore), Maryland 21152
Telephone: (410) 771-4950
Fax: (410) 771-4204

Wayne McCulloch



Species to be tested:

_____ *D. magna*
 _____ *D. pulex*
 _____ *C. dubia*
 _____ *P. promelas*
 _____ Other

☐ *Menidia* sp.
☐ *P. pugio*
☐ *C. variegatus*
☐ *M. bahia*
☐ Other

A = Acute

C = Chronic

B = Bioaccumulation

Client: Allen Family Foods Project No.: _____

NPDES Number: 0000299 Client Purchase Order Number: 4500073719

State/City/County Collected: Harbeson, Delaware Sussex County

[illegible]

Sampled By: <i>Christopher Brinson</i>	Date/Time <i>9-15-10 0800</i>	Received By:	Date/Time
Sampler's Printed Name: <i>Christopher Brinson</i>	Title: <i>Line Leader Operator</i>	Relinquished By:	Date/Time
Relinquished By: <i>Mindy Louise</i>	Date/Time <i>9-15-10 10:00</i>	Received By Laboratory <i>Amelia Goodell</i>	Date/Time <i>9/16/10 1020</i>

Was Sample Chilled During Collection? Yes/No

Comments:

Sample Shipped By: (circle)

Fed. Ex.

Puro.

UPS

Airborne

Other: _____



SAMPLE CHECK-IN FOR GENERAL TESTING

Client: Allen Foods

EA Accession Number: ATO-1008

Parameter	Acceptable Range	Measurement*	Date	Time	Initials
Temperature (°C)	≤4	0.7	9/16/10	1020	CMT
Is ice present?	---	Yes			
pH	6.0-9.0	8.0			
TRC (mg/L)	<0.01	0.01			

*If outside acceptable range, contact project manager.

OTHER PARAMETERS IF REQUIRED (SEE STUDY PLAN):

Parameter	Acceptable Range	(✓)	Date	Time	Initials
Ammonia (preserve aliquot)	--				

EA Ecotoxicology Laboratory *W*
15 Loveton Circle
Sparks (Baltimore), Maryland 21152
Telephone: (410) 771-4950
Fax: (410) 771-4204

Wayne McCulloch



Species to be tested:

_____ *D. manga*
 _____ *D. pulex*
 _____ *C. dubia*
 _____ *P. promelas*
 _____ Other

_____ *Menidia* sp.
 _____ *P. pugio*
 _____ *C. variegatus*
 _____ *M. bahia*
 _____ Other

A = Acute

C = Chornic

B = Bioaccumulation

Client: Allen Family Foods Project No.:

NPDES Number: 0000299 Client Purchase Order Number: 4500073719

State/City/County Collected: Harbeson, Delaware Sussex County

[illegible]

Sampled By: <i>Mich Lause</i>	Date/Time <i>9-16-10 0500</i>	Received By:	Date/Time
Sampler's Printed Name: <i>Michael Lause</i>	Title:	Relinquished By:	Date/Time
Relinquished By: <i>Mich Lause</i>	Date/Time <i>9-17-10 10:00</i>	Received By: <i>Cholm</i>	Date/Time <i>9/18/10 0930</i>
Was Sample Chilled During Collection? <i>Yes</i> No		Sample Shipped By: (circle)	
Comments:		Fed. Ex.	Puro. <i>UPS</i> Airborne
		Other: _____	



**SAMPLE CHECK-IN
FOR GENERAL TESTING**

Client: Allen Family Food

EA Accession Number: ATO-623

Parameter	Acceptable Range	Measurement*	Date	Time	Initials
Temperature (°C)	≤4	-0.2	9/18/10	0930	CH
Is ice present?	--	YES	↓	↓	↓
pH	6.0-9.0	8.0	↓	↓	↓
TRC (mg/L)	<0.01	<0.01	↓	↓	↓

*If outside acceptable range, contact project manager.

OTHER PARAMETERS IF REQUIRED (SEE STUDY PLAN):

Parameter	Acceptable Range	(✓)	Date	Time	Initials
Ammonia (preserve aliquot)	--				



TOXICITY TEST SET-UP BENCH SHEET

Project Number: 70005.08
 Client: Allen Family Foods
 QC Test Number: TA-10-1017

TEST ORGANISM INFORMATION

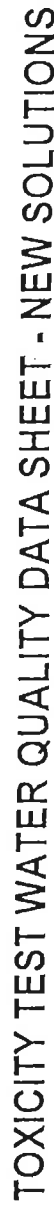
Common Name: Forthard mumm Adults Isolated (Time, Date):
 Scientific Name: P. gersoni Neonates Pulled & Fed (Time, Date):
 Lot Number: FHO-9/18-14 Acclimation: 24h Age: 24 hrs
 Source: EA Culture Water (T/S): 94.7 °C 0 pp

TEST SET-UP

TEST INITIATION				CONCENTRATION SERIES		
Date	Time	Initials	Activity	Test Concentration	Volume Test Material	Final Volume
9/14/10	0930	MD	Dilutions Made	Control	One	1000ml
	0935	MD	Test Vessels Filled	100%	1000ml	↓
	1010	MD	Organisms Transferred			
✓	1105	R	Head Counts			
Comments:						

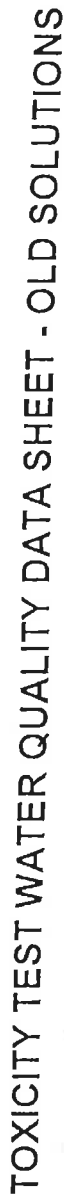
INTERMEDIATE DILUTION PREPARATION AND FEEDING

DILUTION PREPARATION					FEEDING			
Day	Date	Time	Initials	Sample / Diluent	Food: Artemia			
					Day	Time, Initials, Amount	Time, Initials, Amount	Time, Initial Amount
0	9/14/10	0930	MD	ATO-596 LDO-328	0			1600 ml
1	9/15/10	0935	MD	ATO-596 LDO-327	1	0835 MD 3 drops	1130 MD 3 drops	1610 ml 3 drops
2	9/16/10	1110	MD	ATO-608 LDO-329	2	0920 CH 7 drops	1205 MF 4 drops	1530 ml 4 drops
3	9-17-10	0845	R	ATO-608 LDO-329	3	0820 CH 4 drops	1210 CH 4 drops	1515 ml 4 drops
4	9/18/10	1110	CH	ATO-623 LDO-332	4	0930 MF 5 drops	1300 CH 5 drops	1640 CH 5 drops
5	9-19-10	0950	R	ATO-623 LDO-332	5	0850 MF 5 drops	1225 MF 5 drops	1600 MF 5 drops
6	9/20-10	1000	MD	ATO-613 LDO-333	6	0750 MD 5 drops	1215 5 drops	1635 CH 5 drops



TARGET VALUES: Temp: 25 ± 1 °C pH: 6.0 - 9.0 DO: 2.4 mg/L Salinity: 0 ppt Photoperiod: 16 L 8 D Light Intensity: 50 - 100 fc

[illegible]



Project Number: 70005.01
Client: Allen Family Foods
QC Test Number: TM-10-1017

TEST ORGANISM
Common Name: FastTrack medium
Scientific Name: P. pernix

Beginning Date: 9/14/10
Ending Date: 9-21-10

Time: 10:10
Time: 11:05

TARGET VALUES Temp: 25 ± 1 °C pH: 6.0 - 9.0 DO: 2.4 mg/L Salinity: 28 ppt Photoperiod: 16 L, 8 d Light Intensity: 50 - 100 fc

[illegible]

CH 9/16



TEST ORGANISM _____

Common Name: Zethenia americana

Scientific Name: P. pennsylvanica

TEST TYPE: Static / Flowthrough
Renewal / Non-renewal

Photoperiod: 16 L, 8 d Light Intensity: 50 - 100 fc

Beginning Date: 9-14-10 Time: 1010

Ending Date: 9-21-10 Time: 1105

Test Container: 1 L beaker

Test Volume: 250 ml

Test Duration: 7 days

EPA TEST METHOD: (FW) EPA 821-R-02-013/(SW) EPA 821-R-02-012(CHECK ONE):

ATS-T10
12/02/08

Transcribed



WEIGHT DATA (Test Species: P. promelas)

Project Number: 7000501

Client: Albion Family Park

QC Test Number: IN-10-1017

Tin Lot: Black 63

Oven Temp (°C): Start: 100 End: 100

Date 9-21-10 Time 1130 Initials RL

Loaded tins placed in oven: 9-21-10 1130 RL

Loaded tins removed from oven: 9/24/10 1015 MD

Loaded tins weighed: 9/23/10 0845 MD

Oven Number: BLM-01 Balance Number: P0115825

Test Concentration	Rep	Tin #	A Weight of Tin (mg)	B Weight of Tin and Dried Organisms (mg)	B-A Total Dry Organism Weight (mg)	C Number of Organisms Weighed	(B-A)/C Mean Dry Organism Weight (mg)	(if applicable) Mean Biomass (mg/exposed org.)
Control	A	118	29.63	38.07	8.44	10	0.844	0.844
	B	32	28.57	36.41	7.84	9	0.871	0.784
	C	106	28.74	36.71	1.277 7.97	10	0.1277 0.797	0.797
	D	56	29.60	37.06	7.46	9	0.828	0.746
100%	A	67	29.49	37.57	8.08	9	0.897	0.808
	B	46	29.34	35.77	6.43	9	0.714	0.643
	C	66	29.77	37.90	8.13	9	0.903	0.813
	D	74	29.01	37.72	8.71	10	0.871	0.871

Dry wt. calculations checked (date, initials): 10/14/10 MD

Biomass calculations checked (date, initials): 10/14/10 MD



TOXICOLOGY LABORATORY BENCH SHEET

Project Number: 70005.08Client: Allen Family FoodsQC Test Number: TN-10-1016

Aliquot of sample warmed to test temperature, then aerated if supersaturated:

Date	Sample #	ON AIR			OFF AIR		
		Initial DO (mg/L)	Time	Initials	Final DO (mg/L)	Time	Initials
9/14/10	ATO-596	9.7	0900	MM	8.7	0915	MM
9/15/10	ATO-596	9.6	0910	CMF	8.3	0920	CMF
9/16/10	ATO-608	10.1	1055	CMF	8.8	1010	MM
9-17-10	ATO-608	8.2	0830	R	—	—	—
9/18/10	ATO-621 1&2	9.8	1030	CH	8.5	1100	CH
9-19-10	ATO-623 112	9.0	0920	R	8.2	0940	R
9/20/10	ATO-623 20&2	10.1	0835	CMF	8.3	0855	R
9/21/10	ATO-623 10&2	10.2	1545	CMF	8.3	1600	CMF



TOXICOLOGY LABORATORY BENCH SHEET

Project Number: 7005.08

Client: Allen Family Food

QC Test Number: TA-10-1017

Date/Time/Initials

Comments/Activity

Larval Fish Growth and Survival Test-7 Day Survival

Start Date: 9/14/2010 Test ID: TN-10-1017 Sample ID: Allen Family Foods
 End Date: 9/21/2010 Lab ID: Sample Type: Outfall 001
 Sample Date: Protocol: EPAF 91-EPA Freshwater Test Species: PP-Pimephales promelas
 Comments:

Conc-%	1	2	3	4
Control	1.0000	0.9000	1.0000	0.9000
100	0.9000	0.9000	0.9000	1.0000

Conc-%	Mean	N-Mean	Transform: Arcsin Square Root					t-Stat	1-Tailed	
			Mean	Min	Max	CV%	N		Critical	MSD
Control	0.9500	1.0000	1.3305	1.2490	1.4120	7.072	4			
100	0.9250	0.9737	1.2898	1.2490	1.4120	6.318	4	0.655	1.943	0.1209

Auxiliary Tests	Statistic	Critical	Skew	Kurt		
Shapiro-Wilk's Test indicates normal distribution ($p > 0.01$)	0.82784	0.749	0.57143	-1.7286		
F-Test indicates equal variances ($p = 0.82$)	1.33333	47.4672				
Hypothesis Test (1-tail, 0.05)	MSDu	MSDp	MSB	MSE	F-Prob	df
Homoscedastic t Test indicates no significant differences	0.06826	0.07236	0.00332	0.00775	0.53696	1, 6

Larval Fish Growth and Survival Test-7 Day Biomass

Start Date: 9/14/2010 Test ID: TN-10-1017 Sample ID: Allen Family Foods
 End Date: 9/21/2010 Lab ID: Sample Type: Outfall 001
 Sample Date: Protocol: EPAF 91-EPA Freshwater Test Species: PP-Pimephales promelas
 Comments:

Conc-%	1	2	3	4	s.d.
Control	0.8440	0.7840	0.7970	0.7460	0.04044
100	0.8080	0.6430	0.8130	0.8710	0.09809

Conc-%	Mean	N-Mean	Transform: Untransformed					t-Stat	1-Tailed	
			Mean	Min	Max	CV%	N		Critical	MSD
Control	0.7928	1.0000	0.7928	0.7460	0.8440	5.102	4			
100	0.7838	0.9886	0.7838	0.6430	0.8710	12.516	4	0.170	1.943	0.1031

Auxiliary Tests	Statistic	Critical	Skew	Kurt		
Shapiro-Wilk's Test indicates normal distribution ($p > 0.01$)	0.92488	0.749	-1.1669	1.92176		
F-Test indicates equal variances ($p = 0.18$)	5.88307	47.4672				
Hypothesis Test (1-tail, 0.05)	MSDu	MSDp	MSB	MSE	F-Prob	df
Homoscedastic t Test indicates no significant differences	0.10309	0.13004	0.00016	0.00563	0.87086	1, 6

EA Ecotoxicology Laboratory *Wa*
15 Loveton Circle
Sparks (Baltimore), Maryland 21152
Telephone: (410) 771-4950
Fax: (410) 771-4204

Wayne McCulloch



Client: Allen's Family Fund Project No.:

NPDES Number: 0000299 Client Purchase Order Number: 4500073719

State/City/County Collected: De-Harbeson-Susser

FOR OFFICE USE ONLY

Species to be tested:

_____ <i>D. manga</i>	_____ <i>Menidia</i> sp.
_____ <i>D. pulex</i>	_____ <i>P. pugio</i>
_____ <i>C. dubia</i>	_____ <i>C. variegatus</i>
_____ <i>P. promelas</i>	_____ <i>M. bahia</i>
_____ Other	_____ Other

A = Acute C = Chornic B = Bioaccumulation

PLEASE READ SAMPLING INSTRUCTIONS ON BACK OF FORM

[illegible]

Sampled By: <i>rgl</i>	Date/Time	Received By:	Date/Time
Sampler's Printed Name: <i>Thomas J Paine</i>	Title: <i>Asst. Supervisor</i>	Relinquished By:	Date/Time
Relinquished By: <i>rgl</i>	Date/Time <i>10-4-10 - 1100</i>	Received By Laboratory <i>Chandra Kudrui</i>	Date/Time <i>10/5/10 0810</i>

Was Sample Chilled During Collection? Yes/No

Comments:

Sample Shipped By: (circle)

Fed. Ex.

Puro.



Airborne

Other:



SAMPLE CHECK-IN FOR GENERAL TESTING

Client: Allen Family Foods

EA Accession Number: ATO-684

Parameter	Acceptable Range	Measurement*	Date	Time	Initials
Temperature (°C)	≤4	0.1	10/5/10	0815	CMF
Is ice present?	---	Yes	↓	↓	↓
pH	6.0-9.0	7.3	↓	↓	↓
TRC (mg/L)	<0.01	<0.01	↓	↓	↓

*If outside acceptable range, contact project manager.

OTHER PARAMETERS IF REQUIRED (SEE STUDY PLAN):

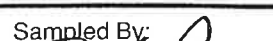


Parameter	Acceptable Range	(✓)	Date	Time	Initials
Ammonia (preserve aliquot)	--				

State/City/County Collected: De-Harbesoy-Sussex

Species to be tested:

A = Acute C = Chornic B = Bioaccumulation

[illegible]

Sampled By: 	Date/Time	Received By:	Date/Time
Sampler's Printed Name: Thomas J Paine	Title: Asst Supervisor	Relinquished By:	Date/Time
Relinquished By: 	Date/Time 10-6-10 - 0800	Received By Laboratory 	Date/Time 10/7/10 0815

Comments:

Airborne

Other: _____



**SAMPLE CHECK-IN
FOR GENERAL TESTING**

Client: Allen Foods

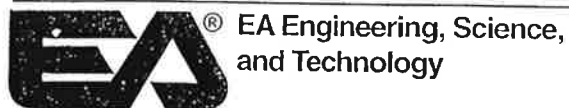
EA Accession Number: ATD - 695

Parameter	Acceptable Range	Measurement*	Date	Time	Initials
Temperature (°C)	≤4	0.0°C	10/7/10	0815	CH
Is ice present?	---	YES	↓	↓	↓
pH	6.0-9.0	7.6	↓	↓	↓
TRC (mg/L)	<0.01	<0.01	↓	↓	↓

*If outside acceptable range, contact project manager.

OTHER PARAMETERS IF REQUIRED (SEE STUDY PLAN):

Parameter	Acceptable Range	(✓)	Date	Time	Initials
Ammonia (preserve aliquot)	---				



EA Ecotoxicology Laboratory
15 Loveton Circle
Sparks (Baltimore), Maryland 21152
Telephone: (410) 771-4950
Fax: (410) 771-4204



FOR OFFICE USE ONLY

Species to be tested:

_____	<i>D. manga</i>	_____	<i>Menidia</i> sp.
_____	<i>D. pulex</i>	_____	<i>P. pugio</i>
<u> y </u>	<i>C. dubia</i>	_____	<i>C. variegatus</i>
_____	<i>P. promelas</i>	_____	<i>M. bahia</i>
_____	Other	_____	Other

A = Acute C = Chronic B = Bioaccumulation

Client: Allens Family Foods Project No.: _____

NPDES Number: 0000299 Client Purchase Order Number: 4500073719

State/City/County Collected: _____

PLEASE READ SAMPLING INSTRUCTIONS ON BACK OF FORM

[illegible]

Sampled By: <i>YG R</i>	Date/Time	Received By:	Date/Time
Sampler's Printed Name: <i>Thomas J Parise</i>	Title: <i>Asst Supervisor</i>	Relinquished By:	Date/Time
Relinquished By: <i>YG R</i>	Date/Time <i>10-8-10 - 0800</i>	Received By Laboratory <i>JR</i> <i>EA</i>	Date/Time <i>10-9-10 0830</i>

Was Sample Chilled During Collection? Yes/No

Comments:

Sample Shipped By: (circle)

Fed. Ex.

Puro.

UPS

Airborne

Other: _____



SAMPLE CHECK-IN FOR GENERAL TESTING

Client: Allen Family Food

EA Accession Number: ATU-206

Parameter	Acceptable Range	Measurement*	Date	Time	Initials
Temperature (°C)	≤4	1.4	10-9-10	0830	JK
Is ice present?	---	Yes	↓	↓	↓
pH	6.0-9.0	7.8	↓	↓	↓
TRC (mg/L)	<0.01	<0.01	↓	↓	↓

*If outside acceptable range, contact project manager.

OTHER PARAMETERS IF REQUIRED (SEE STUDY PLAN):

Parameter	Acceptable Range	(✓)	Date	Time	Initials
Ammonia (preserve aliquot)	--				



C. dubia CHRONIC TOXICITY TEST DATA SHEET

Test Method: EPA 821-R-02-013 (1002.0)

Beginning Date: 10/5/10 Time: 0910

Project Number: 70005.08

Ending Date: 10/11/10 Time: 1430

Client: Allen Family Foods

QC Test Number: TN-10-1172

Adults Isolated Date: 10/4/10 Time: 1205

Test Material: Effluent

Neonates Pulled Date: 10/4/10 Time: 1655

Accession Number: ATO-684

Age of Neonates: <24 hrs Brood Size: 8+

Dilution Water: Med Hard

Source: EA

Accession Number: LDO-351

Culture Water Temperature: 25.3 °C

Test Container: 30 mL cup Test Volume: 15 mL

Photoperiod: 16 L, 8 d Light Intensity: 50 - 100 fc

TEST SET-UP						
TEST INITIATION				CONCENTRATION SERIES		
Date	Time	Initials	Activity	Test Concentration	Volume Test Material	Final Volume
10/5/10	0900	CMF	Dilutions Made	Control	0 mL	200 mL
				100%	100 mL	↓
	0900	CMF	Test Vessels Filled			
	0910	CMF	Organisms Transferred			
	0915	MM	Head Counts			
Comments:						

INTERMEDIATE DILUTION PREPARATION AND FEEDING											
DILUTION PREPARATION						FEEDING					
Day	Date	Time	Initials	Sample / Diluent		Food: YCT + Selenastrum capricornutum					
0						Day	Date	Time	Initials	Amount	
0	10/5/10	0900	CMF	ATO-684 LDO-351		0	10/5/10	0915	MM	200 µL	
1	10/6/10	1045	MM	ATO-684 LDO-354		1	10/6/10	1055	MM	200 µL	
2	10/7/10	0920	CH	ATO-685 LDO-359		2	10/7/10	0940	CH	200 µL	
3	10/8/10	0930	CH	ATO-685 LDO-355		3	10/8/10	1005	CH	200 µL	
4	10/9/10	0945	CH	ATO-706 10 ^{PI} LDO-357		4	10/9/10	1000	CH	200 µL	
5	10/10/10	1110	CMF	ATO-706 LDO-358		5	10/10/10	1120	CMF	200 µL	
6						6					



Wellen family 1000s
Ceriodaphnia dubia CHRONIC TOXICITY TEST QC Test Number: TW-10-117

First column=# neonates; Second column = 0 (female), 1 (dead female), 2 (male), 3 (dead male), 9 (lost replicate)

Con. trs 1

Concentration	Day	1	2	3	4	5	6	7	8	9	10	Time/Initials
	1	0	0	0	0	0	0	0	0	0	0	1050 W
	2	0	0	0	0	0	0	0	0	0	0	0935 C
	3	0	0	0	0	0	0	0	0	0	0	0955 C
	4	4	5	4	4	5	5	4	2	0	5	0955 C
	5	7	6	3	7	6	0	7	7	5	5	1115 C
	6	7	6	6	9	6	3	7	10	6	6	1430 C
	7											

Total # Neonates: 15 17 13 20 17 8 18 21 15 16

Concentration	Day	1	2	3	4	5	6	7	8	9	10	Time/Initials
	1											
	2											
	3											
	4											
	5											
	6											
	7											

Total # Neonates:

Concentration	Day	1	2	3	4	5	6	7	8	9	10	Time/Initials
	1	0	0	0	0	0	0	0	0	0	0	W
	2	0	0	0	0	0	0	0	0	0	0	CH
	3	4	3	2	2	0	0	0	2	4	0	CH
	4	0	0	0	0	5	4	5	0	0	4	CH
	5	5	8	1	6	1	0	7	7	6	4	C.M.F.
	6	10	7	4	8	1	4	7	9	9	6	C.M.F.
	7											

100%

Total # Neonates: 19 18 7 16 7 8 19 18 19 16(4)

Concentration	Day	1	2	3	4	5	6	7	8	9	10	Time/Initials
	1											
	2											
	3											
	4											
	5											
	6											
	7											

Total # Neonates:

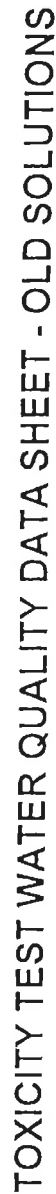
Concentration	Day	1	2	3	4	5	6	7	8	9	10	Time/Initials
	1											
	2											
	3											
	4											
	5											
	6											
	7											

Total # Neonates:

Concentration	Day	1	2	3	4	5	6	7	8	9	10	Time/Initials
	1											
	2											
	3											
	4											
	5											
	6											
	7											

Total # Neonates:

Neonate totals checked (date, initials): 10/12/10, SK



Project Number: 70005, 08
Client: Allen Family Foods
QC Test Number: TU-10-1172

TEST ORGANISM

Common Name: Water Flea
Scientific Name: C. dubia

Beginning Date: 10/5/10 Time: 0910
Ending Date: 10/11/10 Time: 1430

TARGET VALUES Temp: 25 ± 1 °C pH: 6.0 - 9.0 DO: 2.4 mg/L Salinity: 0 ppt Photoperiod: 16 L, 8 D Light Intensity: 50 - 100 fc

% Test Conc	Rep	Temperature (°C)							pH							Dissolved Oxygen (mg/L)							Conductivity (μS/cm) Salinity (ppt)						
		1	2	3	4	5	6	7	1	2	3	4	5	6	7	1	2	3	4	5	6	7	1	2	3	4	5	6	7
Control		24.1	24.5	24.8	24.2	24.5	24.9		8.4	8.2	8.0	8.0	8.1	8.1		7.0	8.3	8.2	7.8	7.9	8.2		354	330	327	336	331	330	
100		24.4	25.0	24.8	24.1	24.6	25.1		8.2	8.2	8.1	8.1	8.0	8.0		7.0	8.5	8.0	8.0	8.1	7.9		1116	1105	1087	1120	1107	1134	
Meter Number		075	645	675	675	675			075	675	675	675	675	675		675	675	675	675	675		675	675	675	675	675	675	675	
Time		1055	6945	1005	1005	1005			1055	0740	1005	1005	1005	1005		1055	0740	1005	1005	1005		1055	0740	1005	1005	1005	1005	1005	
Initials		MM	CM	CM	CH	CH			MM	CH	CH	CH	CH	CMF		MM	CH	CH	CH	CMF		MM	CH	CH	CH	CM	CMF	CMF	



TOXICOLOGY LABORATORY BENCH SHEET

Project Number: 70005.08Client: Allen Family FoodsQC Test Number: TN-10-1172

Aliquot of sample warmed to test temperature, then aerated if supersaturated:

Date	Sample #	ON AIR			OFF AIR		
		Initial DO (mg/L)	Time	Initials	Final DO (mg/L)	Time	Initials
10/5/10	ATO-684	10.4	0840	CMF	8.4	0855	MMJ
10/6/10	ATO-684	9.1	0818	MMJ	8.3	0830	CMF
10/7/10	ATO-695	11.7	0855	CM	8.5	0915	CM
10/8/10	ATO-695	9.0	0855	CM	7.4	0915	Cap
10/9/10	ATO-706	8.3	0935	CM	—	—	—
CMF D110 10/10/10	ATO-724 ATO-706	8.9	0850	CMF	8.3	0900	CMF



TOXICOLOGY LABORATORY BENCH SHEET

Project Number: 70005.08

Client: Allen Family Foods

QC Test Number: TN-10-1172

Date/Time/Initials

Comments/Activity

Ceriodaphnia Survival and Reproduction Test-6 Day Survival

Start Date: 10/5/2010	Test ID: TN-10-1172	Sample ID: Allen Family Foods
End Date: 10/11/2010	Lab ID:	Sample Type: Effluent
Sample Date:	Protocol: EPAF 91-EPA Freshwater	Test Species: CD-Ceriodaphnia dubia
Comments:		

Conc-%	1	2	3	4	5	6	7	8	9	10
Control	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
100	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

Conc-%	Mean	N-Mean	Resp	Not Resp	Total	N	Fisher's Exact P	1-Tailed Critical
Control	1.0000	1.0000	0	10	10	10		
100	1.0000	1.0000	0	10	10	10	1.0000	0.0500

Hypothesis Test (1-tail, 0.05)	NOEC	LOEC	ChV	TU
Fisher's Exact Test	100	>100		1

Ceriodaphnia Survival and Reproduction Test-Reproduction											
Start Date:	10/5/2010	Test ID: TN-10-1172				Sample ID:		Allen Family Foods			
End Date:	10/11/2010	Lab ID:				Sample Type:		Effluent			
Sample Date:		Protocol: EPAF 91-EPA Freshwater				Test Species:		CD-Ceriodaphnia dubia			
Comments:											
Conc-%	1	2	3	4	5	6	7	8	9	10	s.d.
Control	15.000	17.000	13.000	20.000	17.000	8.000	18.000	21.000	15.000	16.000	3.68179
100	19.000	18.000	7.000	16.000	7.000	8.000	19.000	18.000	19.000	14.000	5.1908

Conc-%	Mean	N-Mean	Transform: Untransformed					t-Stat	1-Tailed	
			Mean	Min	Max	CV%	N		Critical	MSD
Control	16.000	1.0000	16.0000	8.0000	21.0000	23.011	10			
100	14.500	0.9063	14.5000	7.0000	19.0000	35.799	10	0.745	1.734	3.4897

Auxiliary Tests	Statistic		Critical	Skew	Kurt	
Shapiro-Wilk's Test indicates normal distribution ($p > 0.01$)	0.87475		0.868	-0.7642	-0.6486	
F-Test indicates equal variances ($p = 0.32$)	1.9877		6.54109			
Hypothesis Test (1-tail, 0.05)	MSDu	MSDp	MSB	MSE	F-Prob	df
Homoscedastic t Test indicates no significant differences	3.48974	0.21811	11.25	20.25	0.46568	1, 18

ATTACHMENT II

Report Quality Assurance Record
(2 pages)



REPORT QUALITY ASSURANCE RECORD

Client: Allen Family Foods

Project Number: 70005.08

Author: Wayne McCall

EA Report Number: 6057

REPORT CHECKLIST

QA/QC ITEM	REVIEWER	DATE
1. Samples collected, transported, and received according to study plan requirements.	<u>Wayne McCall</u>	<u>10/19/10</u>
2. Samples prepared and processed according to study plan requirements.	<u>Wayne McCall</u>	<u>10/19/10</u>
3. Data collected using calibrated instruments and equipment.	<u>Wayne McCall</u>	<u>10/19/10</u>
4. Calculations checked: <ul style="list-style-type: none">- Hand calculations checked- Documented and verified statistical procedure used.	<u>Wayne McCall</u> <u>Wayne McCall</u>	<u>10/19/10</u> <u>10/19/10</u>
5. Data input/statistical analyses complete and correct.	<u>Hilary Hockwood</u>	<u>10/20/10</u>
6. Reported results and facts checked against original sources.	<u>Hilary Hockwood</u>	<u>10/20/10</u>
7. Data presented in figures and tables correct and in agreement with text.	<u>Hilary Hockwood</u>	<u>10/20/10</u>
8. Results reviewed for compliance with study plan requirements.	<u>Wayne McCall</u>	<u>10/19/10</u>

	AUTHOR	DATE
9. Commentary reviewed and resolved.	<u>Wayne McCall</u>	<u>10/21/10</u>
10. All study plan and quality assurance/control requirements have been met and the report is approved:	<u>Wayne McCall</u>	<u>10/21/10</u>
	PROJECT MANAGER	DATE
	<u>Hilary Hockwood</u>	<u>10/20/10</u>
	QUALITY CONTROL OFFICER	DATE
	<u>Mike C. [Signature]</u>	<u>10/20/10</u>
	SENIOR TECHNICAL REVIEWER	DATE

Attachment D – Further Explanation of EPA Form 2C, Item V, Outfall 002

During the last three (3) years of monitoring, no recordable discharges (i.e. discharges resulting from a storm event that is greater than 0.1 inches and at least 72 consecutive hours from the previously measureable storm event) have occurred from Outfall 002. Water collected in Outfall 002 sump has been pumped from the sump and into Anoxic Biological Nutrient Removal (BNR) Basin A, where it subsequently undergoes treatment prior to being discharged via Outfall 001.

Allen Family Foods, Inc. does not intend to discharge untreated water from Outfall 002 for the purposes of acquiring recent (less than 3 years old) analytical data. John DeFriece of the Delaware Department of Natural Resources and Environmental Control agrees with this decision.

Attachment E – Further Explanation of EPA Form 2C, Item V, Outfall 003

During the last three (3) years of monitoring, no recordable discharges (i.e. discharges resulting from a storm event that is greater than 0.1 inches and at least 72 consecutive hours from the previously measureable storm event) have occurred from Outfall 003. Water collected in Outfall 003 sump has been pumped from the sump and into Anoxic Biological Nutrient Removal (BNR) Basin A, where it subsequently undergoes treatment prior to being discharged via Outfall 001.

Allen Family Foods, Inc. does not intend to discharge untreated water from Outfall 003 for the purposes of acquiring recent (less than 3 years old) analytical data. John DeFriece of the Delaware Department of Natural Resources and Environmental Control agrees with this decision.